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January 7, 2025

*Via CM/ECF*

Hon. Lewis J. Liman, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**Re: Freeman v. Giuliani, No. 24-MC-353-LJL (S.D.N.Y.)**  
***Request for Permission to File Pretrial Submission***

Dear Judge Liman:

Counsel for Intervenor-Defendant respectfully requests permission to file his proposed findings of fact and conclusions of law per the Court's Individual Practices in Civil Cases. Owing to technical challenges, the submission was not made prior to 5pm this afternoon, and Your Honor's Order (ECF No. 184) appears to preclude its submission now without leave. Counsel has conferred with Plaintiffs' counsel, who do not object to the request.

Thank you for your consideration.

Respectfully submitted,

/s/ Scott B. McBride  
Scott B. McBride